

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	
	:	
v.	:	Docket No.: 24-00065-4
	:	
RODNEY L. ERMEL	:	

**DEFENDANT RODNEY L. ERMEL’S RESPONSE
TO THE GOVERNMENT’S FIRST STATUS REPORT**

Defendant, Rodney L. Ermel, by and through his undersigned counsel, hereby briefly responds to the Government’s First Status Report dated March 29, 2024 (“Gov’t. Status Report”) (Document #19).

In its Status Report, the government slightly misstates Mr. Ermel’s position concerning his potential readiness for trial, currently scheduled to commence on December 3, 2024. Specifically, the government states:

The government has spoken with counsel for defendant Rodney Ermel, who represented that he and his client are aware of the December 3, 2024 trial date in this matter, and that he and his client are prepared to go to trial on that date, as necessary.

Gov’t. Status Report, p. 2 (emphasis added). Although Mr. Ermel hopes and will endeavor to be prepared to proceed to trial as currently scheduled, whether he will in fact be prepared to so proceed will depend upon the volume of discovery ultimately produced, the dispatch in which it is produced (which the government represents will be shortly), and Mr. Ermel’s ability to efficiently review discovery as it is produced.

Mr. Ermel desires to proceed to trial as soon as reasonably practical without, of course, doing foul to his ability to properly defend the case.

Respectfully submitted:

SAXTON & STUMP

Dated: April 2, 2024

By: /s/ Mark E. Cedrone
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served, this 2nd day of April, 2024, via the Court's Electronic Case Filing ("ECF") System, upon all counsel of record.

/s/ Mark E. Cedrone
MARK E. CEDRONE